

IN THE WESTERN DISTRICT OF MICHIGAN BANKRUPTCY COURT

IN RE: CHRISTINE SKANDIS

Debtor

HON. JOHN GREGG

CASE # 19-05319

FILED
2020 DEC 31 AM 11:59
NICHOLE A. HOSKIN, CLERK
U.S. BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN

MEMORANDUM AND NOTICE OF CONTINUED POST-CONCUSSION SYNDROME

**NOTICE OF ELDER ABUSE COMPLAINT AGAINST
MATTHEW DEPERNO (P52622), DEPERNO LAW,
MARK ZIETLOW (P37022), MARK ZIETLOW LAW OFFICE, NICHOLE SADAK (P81024),
ELDEAN SHIPYARD,
AND BONNIE LENT-DAVIS (P58091)
FOR THE FINANCIAL EXPLOITATION OF SENIOR CITIZENS FORTH COMING**

NOTICE: DECEMBER 22, 2020, NEWS RELEASE MICHIGAN ATTORNEY GENERAL DANA NESSEL:

"Nessel singled out Matthew DePerno, whom she claimed made "false statements" on Newsmax and One America News about the results in Antrim County.

[Nessel said] "I think we need to go back to a time where you can trust an attorney is making an accurate and truthful representation to the court because if they don't, then they won't be able to practice law anymore," Nessel said."

[https://www.deadlinedetroit.com/articles/26951/nessel to seek sanctions for michigan lawyers bringing bogus election suits](https://www.deadlinedetroit.com/articles/26951/nessel%20to%20seek%20sanctions%20for%20michigan%20lawyers%20bringing%20bogus%20election%20suits)

I would like to let the court know that since our last meeting on Dec 2, 2200 I have continued to have symptoms of the postconfusion syndrome which includes headache, nausea or vomiting, dizziness, confusion, memory problems, poor attention and concentration, fatigue and tiring easily, feeling sleepy or not being able to stay awake. Post-concussion Syndrome treatment requires avoidance of stress. Following the 5 plus hours of questioning my headaches were so sever I could not function. My doctor has prescribed concussion-syndrome rehab, physical therapy, occupational therapy and social therapy to cope with the pain and help heal the conconcussion symptoms. The concussion rehab expert says this continual forced exposure of me to stress and computer screens of this case produces toxins in my brain and is not allowing my brain to heal and can cause reference pain throughout my body.

Due to these circumstances I am in a reduced capacity to adequatelt represent and protect myself and fill out all these complicated legal documents required by the Trustee Mr. Moyer and this Court for this involuntary Chapter 7 that this Court is forcing upon me and refuses to accept my multiple motions to withdraw.

I have sought the legal representation of attorney Kerry Hettinger. Mr. Hettinger is located in Kalamazoo and does not work in Grand Rapids so he can not take my case. When looking at my case he

was in shock that I filed a Motion to Withdraw and in the very same day the Judge denied it. He said this is extremely unusual and I really need an attorney to protect me. He said my case is supposed to be in Kalamazoo not Grand Rapids so question why it is being heard in Grand Rapids. He provided 4 attorneys for me to call. I have called them but due to the holidays and probably covid I have not yet heard from them.

On December 28, 2020, the Trustee Mr. Moyer and this Court has demanded I divert my attention away from obtaining an attorney and demand that I focus all my attention of getting you more information and documents to the the Trustee Mr. Moyer and this Court. If I do not focus all my attention on these demanded documents the Trustee Mr. Moyer and this Court stated they intend to arrest me.

In postconcussion syndrome experts say balancing a check book is difficult and stressful, please try to imagine how stressful and difficult these complicated legal schedules and math are on me.

I am providing notice to the Trustee Mr. Moyer and this Court that I will be filing complaints of Elder Abuse against Matthew Deperno (P52622), Deperno Law, Mark Zietlow (P37022), Mark Zietlow Law Office, Nichole Sadak (P81024), Eldean Shipyard, and Bonnie Lent-Davis for the Financial Exploitation of Senior Citizens – myself as senior citizen and my family member, Mr. Richard Skandis, who is a senior citizen and a retired veteran who has served and protected our country for nearly 50 years.

Alarminglly, MATTHEW DEPERNO (P52622), DEPERNO LAW, have a history of abuse and committed similar acts against Mr. and Mrs. Moffit as he committed against Skandis.

2014-64076-CH-D, Moffits v Matthew Deperno (Van Buren Circuit Court)
2015-000175-CZ (Kalamazoo Circuit Court)
Case 328739 (Michigan Court Of Appeals)

Below are excerpts from **Michigan Court of Appeals** final court opinion stating, [Exhibit J]

“The complaint included allegations of assault and battery, intentional infliction of emotional distress, and malpractice, and it is clear to us that those allegations were obviously at issue in that case. While the Moffits may have elected not to further pursue those claims in hopes of facilitating settlement, plaintiffs’ position that they were irrelevant to that case has no merit. Indeed, even if we assume that the Moffits’ lawsuit against DePerno was limited solely to a fee dispute, the fact that DePerno allegedly assaulted and battered the Moffits, intentionally inflicted emotional distress on the Moffits, and committed malpractice in representing the Moffits certainly related to whether he was entitled to the \$137,000 in attorney fees that he sought.”

“According to the Moffits’ complaint, DePerno was retained “to resolve a tax debt to the IRS of approximately \$36,000.” DePerno apparently sought \$137,779.38, an amount

greater than the \$108,000 settlement reached between the Moffits and the insurance company. After the Moffits objected to the \$137,000 amount, DePerno commenced a foreclosure action against the Moffits."

In this case, plaintiffs take issue with defendants' inclusion of a document entitled "Interoffice Memorandum" with their motion for summary disposition. This memorandum included discussions centering on **DePerno's timekeeping issues with another law office. These issues included "time being entered without explanation," "billable hours being 'padded,' " "excessive" write-offs, and manipulations "of the timekeeping/bill system to maintain . . . quota hours on accounts that may not render payment."**

"The complaint included allegations of assault and battery, intentional infliction of emotional distress, and malpractice, and it is clear to us [COA] that those allegations were obviously at issue in that case. While the Moffits may have elected not to further pursue those claims in hopes of facilitating settlement, plaintiffs' position that they were irrelevant to that case has no merit. Indeed, even if we assume that the Moffits' lawsuit against DePerno was limited solely to a fee dispute, the fact that DePerno allegedly assaulted and battered the Moffits, intentionally inflicted emotional distress on the Moffits, and committed malpractice in representing the Moffits certainly related to whether he was entitled to the \$137,000 in attorney fees that he sought."

Sadly, Mr. Moffit barely survived two years after enduring the intentional emotional duress and trauma inflicted upon him by MATTHEW DEPERNO (P52622) and DEPERNO LAW.

Now I too am suffering ill health at the hands of Matthew Deperno [and Mark Zietlow Law Office, Nichole Sadak (P81024), Eldean Shipyard, and Bonnie Lent-Davis for their Financial Exploitation of Senior Citizens] and the stress of these court pleadings. If you do not believe the stress is real, please reference Legal Abuse Syndrome. Per Wikipedia,

"Legal Abuse Syndrome (LAS) is a form of post traumatic stress disorder (PTSD) caused by ethical violation, legal abuse, betrayal, abuse of power, abuse of authority, lack of accountability and fraud."

I am asking you, Mr. Moyer, Judge Gregg and this Court, please do not aid and abet Elder Abuse and Financial Exploitation of Senior Citizens by allowing MATTHEW DEPERNO (P52622) and DEPERNO LAW [and Mark Zietlow Law Office, Nichole Sadak (P81024), Eldean Shipyard, and Bonnie Lent-Davis] to make me one of his [their] casualties.

People that know me tell me my health and life are not worth sacrificing to obtain justice and equity. They tell me the Courts are unfair and side with attorneys no matter what, that I will never prevail as a pro per. So far, they are correct on all counts. I had faith in the justice system, but my faith is dissipating as the stress is waning my health.

ON DECEMBER 22, 2020, IN A NEWS RELEASE MICHIGAN ATTORNEY GENERAL DANA NESSEL,

"Nessel singled out MATTHEW DEPERNO, whom she claimed made "false statements" on Newsmax and One America News about the results in Antrim County.

[Nessel said] "I think we need to go back to a time where you can trust an attorney is making an accurate and truthful representation to the court because if they don't, then they won't be able to practice law anymore," Nessel said."


"Detroit is seeking monetary sanctions, barring the plaintiff's attorneys [MATTHEW DEPERNO] from practicing in the Eastern District and a requirement that the plaintiffs and their counsel [MATTHEW DEPERNO] post a bond of \$100,000 prior to filing any other action related to the case."

[https://www.deadlinedetroit.com/articles/26951/nessel to seek sanctions for michigan lawyers bringing bogus election suits](https://www.deadlinedetroit.com/articles/26951/nessel-to-seek-sanctions-for-michigan-lawyers-bringing-bogus-election-suits)

I am requesting a stay of proceedings until Adult Protective Services is able to investigate Matthew Deperno (P52622), Deperno Law, Mark Zietlow (P37022), Mark Zietlow Law Office, Nichole Sadak (P81024), Eldean Shipyard, and Bonnie Lent-Davis for the Financial Exploitation of Senior Citizens; and we hold our next 341 once investigation is complete. I have made edits to the schedules based on my last meeting with Mr. Moyer and emailed to him. I would like legal representation to further review and correct.

This is a serious matter, the Trustee Mr. Moyer, Judge Gregg and this Court are planning to take everything I have worked my whole life for including the roof from over my head because of, and at the hands of, Matthew Deperno (P52622), Deperno Law, Mark Zietlow (P37022), Mark Zietlow Law Office, Nichole Sadak (P81024), Eldean Shipyard, and Bonnie Lent-Davis who have committed Elder Abuse and the Financial Exploitation of Senior Citizens.

Dated: December 31, 2200


Christine Skandis
312 Hoffman Street
Saugatuck, MI 49453



AMB REFERRAL TO PHYSICAL THERAPY AND
ATHLETIC TRAINING

Ordered by Lesli A Casten, MD on Nov 19, 2020

Expected: As directed

AMB REFERRAL TO SPEECH THERAPY

Ordered by Ashley L Kulwicki, PA on Nov 24, 2020

Expected: As directed

What Can I Do to Help Feel Better After a Mild Traumatic Brain Injury?

Although most people recover after a concussion, how quickly they improve depends on many factors. These factors include how severe their concussion was, their age, how healthy they were before the concussion, and how they take care of themselves after the injury.

Some people who have had a concussion find that at first it is hard to do their daily activities, their job, to get along with everyone at home, or to relax.

Rest is very important after a concussion because it helps the brain to heal. Ignoring your symptoms and trying to “tough it out” often makes symptoms worse. Be patient because healing takes time. Only when your symptoms have reduced significantly, in consultation with your health care professional, should you slowly and gradually return to your daily activities, such as work or school. **If your symptoms come back or you get new symptoms as you become more active, this is a sign that you are pushing yourself too hard. Stop these activities and take more time to rest and recover.** As the days go by, you can expect to gradually feel better.

Getting Better: Tips for Adults

- Get plenty of sleep at night, and rest during the day.
- **Avoid activities that are physically demanding or require a lot of concentration (e.g., balancing your checkbook). They can make your symptoms worse and slow your recovery.**
- When your health care professional says you are well enough, return to your normal activities gradually, not all at once.
- Because your ability to react may be slower after a concussion, ask your health care professional when you can safely drive a car, ride a bike, or operate heavy equipment.
- Talk with your health care professional about when you can return to work. Ask about how you can help your employer understand what has happened to you.
- Consider talking with your employer about returning to work gradually and about changing your work activities or schedule until you recover (e.g., work half-days).
- Take only those drugs that your health care professional has approved.
- Do not drink alcoholic beverages until your health care professional says you are well enough. Alcohol and other drugs may slow your recovery and put you at risk of further injury.
- Write down the things that may be harder than usual for you to remember.
- If you're easily distracted, try to do one thing at a time. For example, don't try to watch TV while fixing dinner.
- Consult with family members or close friends when making important decisions.
- Do not neglect your basic needs, such as eating well and getting enough rest.
- **Avoid sustained computer use,** including computer/video games early in the recovery process.

UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF MICHIGAN

IN RE: CHRISTINE SKANDIS
Debtor

HON. JOHN T. GREGG
CASE NO: 19-05319

PROOF OF SERVICE

I hereby certify that on December 31, 2020, a copy of the foregoing was served upon the Clerk of the Court in person using the email system which will send notification of such filing to the following:

Jeff A. Moyer, Chapter 7 Trustee
PO Box 337
Grandville, MI 49468

I also emailed to: "Jeff A. Moyer" <jeff@thebankruptcygrp.com>, "Rietberg, Dean (USTP)" <Dean.E.Rietberg@usdoj.gov>

DOCUMENTS SERVED:

Memorandum And Notice Of Continued Post-Concussion Syndrome
Notice Of Elder Abuse Complaint Against
Matthew Deperno (P52622), Deperno Law,
Mark Zietlow (P37022), Mark Zietlow Law Office, Nichole Sadak (P81024),
Eldean Shipyard,
And Bonnie Lent-Davis (P58091)
For The Financial Exploitation Of Senior Citizens

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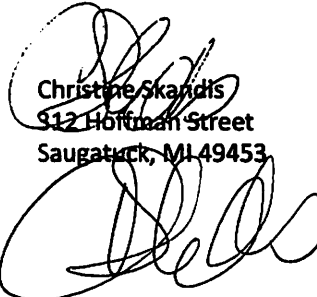
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Proof Of Service

Dated: December 31, 2200


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